

varian®

May 18, 1990

BY FEDERAL EXPRESS MAIL

Ruth Mancos
Emergency Support Section
U.S. Environmental Protection Agency, 5HS-11
230 South Dearborn street
Chicago, Illinois 60604

Re: Request for Information Pursuant to Section 104(e) of
CERCLA and Section 3007 of RCRA, for the Conservation
Chemical Company Site, in Gary, Indiana

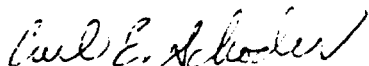
Dear Ms. Mancos:

This is to respond to Robert J. Bowden's January 30, 1990
letter, received by Varian Associates, Inc. on April 25, 1990,
regarding the Conservation Chemical Company Site.

Enclosed are (1) Varian's responses to the EPA's Request for
Information, (2) copies of documents referenced in Varian's
responses and called for by the EPA's Request of Information and
(3) a notarized Affidavit executed by the undersigned.

Please call with any questions or concerns in this regard.

Very truly yours,



Carl Schoder
Manager,
Corporate Environmental Services

Enclosures

5/22/90
1 Box of appendices
for review - EERO

SPECIFIC REQUESTS AND RESPONSES
CONSERVATION CHEMICAL SITE, GARY, INDIANA

1. Identify all persons consulted in the preparation of the answers to these Information Requests.

Response:

Carl Clemm, Director, Corporate Facilities
Carl Schoder, Manager, Environmental Services
Gary Kern, Corporate Environmental Engineer
Ray Bly, Manager, Tax Department
Allen Jones, Treasurer
Arthur Homan, Corporate Counsel
Randy Rodriguez, Corporate Counsel
James Ray, Corporate Counsel
Marietta Gianetti, Office Administrator, Risk Management
Ronald Houseman, Esq., Tuttle & Taylor

All of these persons except Ronald Houseman are current Varian employees at its Corporate Headquarters, 611 Hansen Way, Palo Alto, CA 94303, (415) 493-4000.

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests and provide copies of all such documents.

Response:

The only documents consulted, examined or referred to in the preparation of Varian's responses to these Requests, other than those provided herewith in response to Request Nos. 8, 9 and 10, were Varian's Corporate Environmental Services files regarding Varian's former National Electronics Division facility and documents made available to Varian by the attorneys for the so-called 6500 Industrial Highway Group. True and correct copies of those files are provided herewith as Exhibits 1 and 2, respectively.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

Response:

Varian sold its National Electronics Division to Richardson Electronics, Ltd., then doing business at 3030 North River Road, Franklin Park, IL 60131, on May 29, 1981. Richardson Electronics, Ltd., is now doing business at 40W267 Keslinger Road, LaFox, IL 60147, (312) 232-6400.

Varian believes that its former National Electronics Division is presently operating as National Electronics, Inc., a wholly-owned subsidiary of Richardson Electronics, Ltd., and doing business at Keslinger Road, LaFox, IL, with a mailing address of P.O. Box 269, Geneva, IL 60134.

The only former employees of National Electronics Division who Varian can identify and believes may be able to provide a more detailed response to any Information Request are those persons identified in the documents provided herewith as Exhibits 1 and 2. Those persons are:

LaMonte Walker, Safety Administrator
Eugene Loeb, General Manager
Harry Haase, (Position unknown)
Mark Peterson, Purchasing
R.L. Prevost, Materials Manager
Larry B. Higgins, Purchasing

In addition, the only former employee of Varian who Varian can identify and believes may be able to provide a more detailed response to any Information Request is Edward Wolovich, a former Corporate Plant Engineer. Mr. Wolovich last worked at Varian on 12/24/81 and his last known address was 1575 Tenaka Place, Sunnyvale, CA 94087, (408) 733-0174. Varian has not located Mr. Wolovich.

Former employees of National Electronics Division, current or former employees of National Electronics, Inc., or current or former employees of Richardson Electronics, Ltd., may be able to provide more detailed or complete responses to these Requests.

Varian did not retain sufficient information after the sale of its National Electronics Division to be able to identify any additional persons. All documents in the possession, custody or control of Varian's former National Electronics Division regarding the operations of National Electronics Division were transferred to Richardson Electronics, Ltd., and/or its wholly-owned subsidiary National Electronics, Inc., at or about the time National Electronics Division was sold to Richardson Electronics, Ltd. Accordingly, additional responsive information or documents would be in the possession, custody or control of Richardson Electronics, Ltd., and/or National Electronics, Inc.

4. List the EPA Identification Numbers of the Respondent.

Response:

To the extent that this Information Request relates to Varian's former National Electronics Division, its EPA Identification Number was ILD062405204. Other Varian EPA Identification Numbers are as follows:

- (a) Varian Associates Corporate Headquarters -
CAD009120817
- (b) Varian Associates LS&E Division -
CAT080010804
- (c) Varian Associates EIMAC Division - San Carlos
CAD009438300
- (d) Varian Associates Walnut Creek Division -
CAD009448382
- (e) Varian Associates Solid State Microwave Division -
CAT000625392
- (f) Varian Associates (MCSD) -
CAD021885447
- (g) Varian Triangle Park -
CAD981689979
- (h) Varian Associates (Milpitas) -
CAD981443674
- (i) Varian Instrument Service -
CAD982018574
- (j) Fremont -
CAD981689979
- (k) EIMAC Salt Lake -
UTD009438359
- (l) Tempe Electronics -
AZD139456875
- (m) Analytichem -
CAD081626757
- (n) Beverly Microwave -
MAD001028760
- (o) Vacuum Products (Lexington) -
MAD053481404
- (p) Continental Electronics -
TXD062869979
- (q) Extrion Gloucester -
MAD075362616
- (r) Extrion Danvers -
MAD981203862
- (s) Extrion Beverly -
MAP000043743

5. Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants and damages resulting therefrom.

Response:

Varian is unaware of any acts or omissions of any persons that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants from the Site.

6. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances, including but not limited to, AROCLOR 1016, AROCLOR 1221, AROCLOR 1232, AROCLOR 1242, AROCLOR 1248, AROCLOR 1254, AROCLOR 1260, or any other polychlorinated biphenyl (PCB) by you, your contractors, or by prior owners and/operators.

Response:

Varian reads this Information Request as calling for information to the extent that it relates to the Site. After a reasonably diligent inquiry, and based on documents made available to Varian by the attorneys for the so-called 6500 Industrial Highway Group, Varian believes that its only relationship to the Site was through its former National Electronics Division facility (the "Facility"). Accordingly, Varian has limited its search for information responsive to this Request to the Site and that Facility.

Provided herewith as Exhibit 2 are true and correct copies of all documents provided to Varian by the attorneys for the so-called 6500 Industrial Highway Group, which documents reflect shipments of certain substances from the Facility to the Site. According to those documents and certain documents provided herewith as Exhibit 1, the following National Electronics Division and Varian employees may have knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances at the Facility:

National Electronics Division:

LaMonte Walker, Safety Administrator
Eugene Loeb, General Manager
Harry Haase, (Position unknown)
Mark Peterson, Purchasing
R.L. Prevost, Materials Manager
Larry B. Higgins, Purchasing

Varian:

Edward Wolovich, former Corporate Plant Engineer
Carl Schoder, Manager, Corporate Environmental Services

Varian has no other information responsive to this Request. Varian did not retain sufficient information after the sale of its National Electronics Division to be able to identify any additional persons. Former employees of National Electronics Division, current or former employees of National Electronics, Inc., and/or current or former employees of Richardson Electronics, Ltd., may be able to provide information responsive to this Request.

7. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials, including but not limited to, AROCLOR 1016, AROCLOR 1221, AROCLOR 1232, AROCLOR 1242, AROCLOR 1248, AROCLOR 1254, AROCLOR 1260 OR any other (PCB)? If the answer to the preceding question is anything but an unqualified "no", identify:

Response:

Varian reads this Information Request as calling for information to the extent that it relates to the Site. After a reasonably diligent inquiry, and based on documents provided to Varian by the attorneys for the so-called 6500 Industrial Highway Group, Varian believes that its only relationship to the Site was through its former National Electronics Division facility ("the Facility"). Accordingly, Varian has limited its search for information responsive to this Request to the Site and that Facility.

The only responsive information in the possession of and available to Varian is set forth below. Varian did not retain sufficient information after the sale of its National Electronics Division to be able to otherwise respond to this Request. Former employees of National Electronics Division, current or former employees of National Electronics, Inc., and/or current or former employees of Richardson Electronics, Ltd., may be able to provide more information responsive to this Request.

a) The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance;

Response:

The following hazardous substances may have been used, purchased, stored, treated, disposed, transported and/or otherwise handled by the Facility, according to documents provided herewith as Exhibits 1 and 2:

(i) Acids (including boric, hydrochloric, nitric, acetic, sulfuric, phosphoric, glutonic and hydrofluoric acids and ammonium fluoride), which are corrosive materials and typically exist as solids or liquids;

(ii) Caustic materials (including sodium hydroxide, sodium hypochlorite, hydrated lime, and ammonium hydroxide) which are corrosive and typically exist as solids or liquids;

(iii) Solvents (including acetone, methanol, Freon, trichloroethylene, phenol, xylene and isopropyl), which are typically flammable or potentially toxic and exist as liquids;

(iv) Metals (including copper, nickel, nickel plating solutions and mercury), which are potentially toxic and typically exist as solids or in solutions;

(v) Cyanides (including copper and sodium), which are poisonous and typically exist as solids unless in solution;

(vi) Sodium hypochlorite is an oxidizer, which typically exists as a solution and;

(vii) Polychlorinated biphenyls, which are potentially toxic and may have existed in dielectric oils of sealed transformers and capacitors.

b) Who supplied you with such hazardous substances:

Response:

Varian has no information responsive to this Request.

c) How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;

Response:

As identified in certain documents provided herewith as Exhibit 1, hazardous substances may have been used in the manufacture of power semiconductor components (silicon thyristors and rectifiers) and cold cathode readout tubes (gaseous electron tubes). Hazardous substances may have been used for the electroplating of copper and nickel metal parts, the cleaning of copper parts, the etching of silicon and aluminum and waste water treatment. Corrosive process rinse waters may have been neutralized with caustic in the Facility wastewater treatment system, while all other wastes may have been transported off site for treatment or disposal in drums or barrels. PCB's may have been present at the Facility in sealed transformers and capacitors used in the manufacturing equipment in 1980.

According to the documents provided herewith as Exhibit 2, the following hazardous substances may have been transported from the Facility to the Site:

- waste acid, acid, mixed acids
- HF and nitric
- HCL, nitric, HF mixture
- spent mixed acids
- caustic soda
- waste acetone, acetone, spent acetone
- methanol
- acetone & trichlor
- solvents (methanol, acetone)
- waste Freon
- mixed solvents, solvents, spent solvents
- solvents and acetone
- waste perchloride etholene
- cyanide
- oil, used oil, waste oil
- spent oil solution
- oil, methanol and mixed solvents
- spent Nickel
- nickel plate
- nickel plating sludge
- nickel plating solution
- acetate
- agrate

Varian has no other information responsive to this Request.

d) When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you:

Response:

Documents provided herewith as Exhibit 1 indicate certain hazardous substances identified above may have been used, purchased, generated, stored, treated, transported, disposed or otherwise handled at the Facility between January 26, 1979 and June 1, 1981. Certain of the hazardous substances identified above may have been shipped to the Site between October 19, 1972 and November 28, 1978, according to and as more particularly stated in the documents provided herewith as Exhibit 2. Varian has no other information responsive to this Request.

e) Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and

Response:

According to the documents provided herewith as Exhibit 1, those hazardous substances may have been transported for treatment or disposal to:

- (i) Waste Research and Reclamation
Route 3, Eau Claire, WI. 54701
- (ii) Wes-com
(Address unknown)
- (iii) Nuclear Engineering Co., Inc.
Sheffield, IL. site
9200 Shelbyville Road, Suite 526
Louisville, Kentucky 40207

Certain of the hazardous substances identified above may have been used, purchased, stored, treated, transported, disposed and/or otherwise handled by the Facility, according to the documents provided herewith as Exhibits 1 and 2. Varian has no other information responsive to this Request.

f) The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

Response:

According to the documents provided herewith as Exhibit 2, the following substances may have been transported to the Site in containers of the following sizes:

Substance	No. of Containers	Container Size
Waste Acid	13	28 gallons
	25	30 gallons
	5	55 gallons
Acid	1	5 gallons
	28	28 gallons
	50	55 Gallons
HF and Nitric	25	28 gallons
HCL, Nitric, HF mixture	72	30 gallons
	15	55 gallons
Spent mixed acids	4	28 gallons
	17	30 gallons
	9	55 gallons
Mixed Acids	163	28 gallons
	25	30 gallons
	13	55 gallons
Caustic Soda	4	55 gallons
Waste Acetone	2	Unknown
	10	55 gallons
Acetone	4	5 gallons
	55	55 gallons
Spent Acetone	10	55 gallons
Methanol	11	55 gallons
Spent Methanol	6	55 gallons
Acetone & Trichlor	8	55 gallons
Solvents	27	55 gallons
(Methanol, Acetone)		
Waste Freon	6	55 gallons
Mixed Solvents	15	15 gallons
	56	55 gallons
Solvents	160	55 gallons
Spent Solvents	58	55 gallons
Solvents and Acetone	34	55 gallons
Waste Perchloride Etholene		
	12	Unknown
Cyanide	1	55 gallons

Substance	No. of Containers	Container Size
Oil	10	55 gallons
Used Oil	13	55 gallons
Spent Oil solution	4	55 gallons
Waste Oil	10	Unknown
Oil, methanol and mixed solvents	65	55 gallons
Spent Nickel	1	55 gallons
Nickel Plate	2	55 gallons
Nickel Plating Sludge	3	55 gallons
Nickel Plating Solution	2	55 gallons
Acetate	3	55 gallons
Agrate	1	55 gallons

Varian has no information regarding the actual quantities, chemical composition, characteristics or physical state of substances in those containers or otherwise responsive to this Request.

8. Identify all liability insurance policies held by Respondent from 1970 to 1985. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, nonsudden or both types of accidents. In lieu of providing this information, you may submit complete copies of all relevant insurance policies.

Response:

Provided herewith as Exhibit 3 are true and correct copies of all liability insurance policies held by Varian with coverage terms from 1970 to 1985.

9. Provide copies of all income tax returns sent to the Federal Internal Revenue Service in the last three years.

Response:

Provided herewith as Exhibit 4 are true and correct copies of all income tax returns sent to the Federal Internal Revenue Service in the last three years.

10. If Respondent is a Corporation, respond to the following requests:

- a) Provide a copy of the Articles of Incorporation and By-Laws of the Respondent.
- b) Provide Respondent's financial statements for the past five fiscal years, including, but not limited to those filed with the Internal Revenue Service.
- c) Identify all of Respondent's current assets and liabilities and the person who currently own or are responsible for such assets and liabilities.

Response:

- a. Provided herewith as Exhibit 5 are true and correct copies of Varian's Restated Certificate of Incorporation and Bylaws.
- b. Provided herewith as Exhibit 5 are true and correct copies of Varian's Annual Reports for the 1985, 1986, 1987, 1988 and 1989 fiscal years; included in those Annual Reports are Varian's financial statements.
- c. Request No. 10.c. calls for information which would be burdensome, if not impossible, to produce. Varian's assets are valued in the financial statements produced herewith.

11. If Respondent is a Partnership, provide copies of the Partnership Agreement.

Response:

Varian is not a partnership.

12. If Respondent is a Trust, provide all relevant agreements and documents to support this claim.

Response:

Varian is not a trust.

AFFIDAVIT

I, CARL SCHODER, do hereby declare as follows:

1. I am the Manager of Corporate Environmental Services at Varian Associates, Inc. As such, I was responsible for supervising the collection of information responsive to the U.S. Environmental Protection Agency Request for Information regarding the Conversation Chemical Company Site.

2. I am informed and believe, based on my supervision of the collection of responsive information, that (a) a diligent search for responsive records has been completed, (b) there has been a reasonably diligent interview process of certain present employees of Varian who may have knowledge of the operations, hazardous substance use, storage, treatment, releases, spills disposal or handling practices of Varian's former National Electronics Division facility between 1970 and 1985, and (c) all responsive information in the possession, custody or control of Varian is being provided herewith to the EPA, other than as specifically noted in Varian's responses hereinabove.

I declare that the foregoing is true and correct to the best of my knowledge.

Executed this 18 day of May, 1990, at Palo Alto, California.



CARL SCHODER